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BEFORE THE  
BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

Case No. 3072

**CATHLEEN E. HUTCHINSON**  
8836 Fortuna Way  
Orangevale, CA 95662

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

Pharmacy Technician Registration TCH 30078

Respondent.

**DECISION AND ORDER**

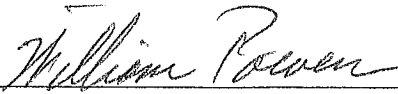
The attached Stipulated Surrender of Pharmacy Technician License No. TCH 30078 issued to Cathleen E. Hutchinson is hereby adopted by the Board of Pharmacy, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on December 20, 2007.

It is so ORDERED November 20, 2007.

BOARD OF PHARMACY  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

By

  
WILLIAM POWERS  
Board President

1 EDMUND G. BROWN, JR., Attorney General  
of the State of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 JESSICA M. AMGWERD, State Bar No. 155757  
Deputy Attorney General  
4 California Department of Justice  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 324-5393  
Facsimile: (916) 324-5567

7 Attorneys for Complainant

8  
9 **BEFORE THE**  
**BOARD OF PHARMACY**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 3072

12 **CATHLEEN E. HUTCHINSON**  
8836 Fortuna Way  
13 Orangevale, CA 95662

OAH No. 2007070437

14 Pharmacy Technician Registration TCH 30078

**STIPULATED SURRENDER AND  
ORDER**

15 Respondent.

16  
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this  
18 proceeding that the following matters are true:

19 PARTIES

20 1. Virginia K. Herold (Complainant) is the Executive Officer of the Board of  
21 Pharmacy (Board). She brought this action solely in her official capacity and is represented in  
22 this matter by Edmund G. Brown, Jr., Attorney General of the State of California, by Jessica M.  
23 Amgwerd, Deputy Attorney General.

24 2. Cathleen Elyce Hutchinson (Respondent) is represented by John Manning.

25 3. On or about July 28, 1999, the Board issued Pharmacy Technician License  
26 No. TCH 30078 to Respondent.

27 JURISDICTION

28 4. Accusation No. 3072 was filed before the Board of Pharmacy (Board),

1 Department of Consumer Affairs, on June 4, 2007, and is currently pending against Respondent.  
2 The Accusation and all other statutorily required documents were properly served on Respondent  
3 on June 7, 2007. Respondent filed her Notice of Defense contesting the Accusation. A copy of  
4 Accusation No. 3072 is attached as exhibit A and incorporated herein by reference.

5 ADVISEMENT AND WAIVERS

6 5. Respondent has carefully read, and understands the charges and allegations  
7 in Accusation No. 3072. Respondent also has carefully read, and understands the effects of this  
8 Stipulated Surrender of License and Order.

9 6. Respondent is fully aware of her legal rights in this matter, including the  
10 right to a hearing on the charges and allegations in the Accusation, the right to be represented by  
11 counsel, at Respondent's own expense; the right to confront and cross-examine the witnesses  
12 against Respondent; the right to present evidence and to testify on Respondent's own behalf; the  
13 right to the issuance of subpoenas to compel the attendance of witnesses and the production of  
14 documents; the right to reconsideration and court review of an adverse decision; and all other  
15 rights accorded by the California Administrative Procedure Act and other applicable laws.

16 7. Respondent voluntarily, knowingly, and intelligently waives and gives up  
17 each and every right set forth above.

18 8. This settlement shall be for the purposes of this proceedings, any future  
19 proceedings before the parties and any other actions taken by or before any governmental agency  
20 responsible for licensing, and shall not be used for any civil or criminal proceedings.

21 CULPABILITY

22 9 Respondent admits that from January 21, 2005, through January 30, 2006,  
23 while she was working at Longs Drug Store #93 in Citrus Heights, California, she fraudulently  
24 filled and refilled Hydrocodone with acetaminophen prescriptions without authorizations. On  
25 October 4, 2006, Respondent pled nolo contendere to a misdemeanor violation of Penal Code  
26 section 487(b) [grand theft], which was dismissed pursuant to Penal Code section 1385 on  
27 January 11, 2007. Respondent admits to violating the following Business and Professions Code  
28 sections:



1 agree that the Board may, without further notice or formal proceeding, issue and enter the  
2 following Order:

3 **ORDER**

4 IT IS HEREBY ORDERED that Pharmacy Technician License No. TCH 30078,  
5 issued to Cathleen E. Hutchinson is surrendered and accepted by the Board of Pharmacy.

6 15. The surrender of Respondent's pharmacy license and the acceptance of the  
7 surrendered license by the Board shall constitute the imposition of discipline against Respondent.  
8 This stipulation constitutes a record of the discipline and shall become a part of Respondent's  
9 license history with the Board.

10 16. Respondent shall cause to be delivered to the Board both Respondent's  
11 license wall and pocket license certificate on or before the effective date of the Decision and  
12 Order.

13 17. Respondent understands and agrees that if Respondent ever applies for  
14 licensure or petitions for reinstatement in the State of California, the Board shall treat it as a new  
15 application for licensure. Respondent must comply with all the laws, regulations and procedures  
16 for licensure in effect at the time the application or petition is filed, and all of the charges and  
17 allegations contained in Accusation No. 3072 shall be deemed to be true, correct, and admitted  
18 by Respondent when the Board determines whether to grant or deny the application or petition.

19 18. Upon application for a new license or a petition for reinstatement,  
20 Respondent shall pay to the Board costs associated with its investigation and enforcement  
21 pursuant to Business and Professions Code section 125.3 in the amount of Two Thousand  
22 Dollars (\$2,000.00).

23 19. Should Respondent ever apply or reapply for a new license or certification,  
24 or petition for reinstatement of a license, by any other health care licensing agency in the State of  
25 California, all of the charges and allegations contained in Accusation and Petition To Revoke,  
26 No. 3072 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any  
27 Statement of Issues or any other proceeding seeking to deny or restrict licensure.

28 20. Respondent shall not apply for licensure or petition for reinstatement for

1 three (3) years from the effective date of the Board of Pharmacy's Decision and Order.

2 ACCEPTANCE

3 I, Cathleen E. Hutchinson have carefully read the above Stipulated Surrender of  
4 License and have discussed it with my attorney and enter into this agreement freely and  
5 voluntarily with full knowledge of its force and effect, do hereby surrender my Pharmacy  
6 Technician License No. TCH 30078 to the Board of Pharmacy, Department of Consumer Affairs,  
7 State of California, for its formal acceptance. By signing this Stipulated Surrender of License I  
8 recognize that upon its formal acceptance by the Board I will lose all rights and privileges to  
9 practice as a pharmacy technician in the State of California and I will also cause to be delivered  
10 to the Board both my license and wallet certificate before the effective date of the decision.

11 I further agree that a facsimile copy of this Stipulated Surrender of License and  
12 Order including facsimile copies of signatures, may be used with the same force and effect as the  
13 originals.

14 DATED: 10-12-07

15  
16  
17  
18 Dated: 10/15/07

  
CATHLEEN E. HUTCHINSON  
Pharmacy Technician License No. TCH 30078

Respondent

JOHN MANNING

19  
20 By:

  
JOHN MANNING

Attorney for Respondent

1 ENDORSEMENT

2 The foregoing Surrender of license is respectfully submitted for consideration by  
3 the Board of Pharmacy, Department of Consumer Affairs.

4 DATED: October 15, 2007

5 EDMUND G. BROWN, Attorney General  
6 of the State of California

7 By: Jessica M. Amgwerd  
8 JESSICA M. AMGWERD  
9 Deputy Attorney General

10 **Attorneys for Complainant**

1 EDMUND G. BROWN, JR., Attorney General  
of the State of California  
2 ARTHUR D. TAGGART  
Supervising Deputy Attorney General  
3 JESSICA M. AMGWERD, State Bar No. 155757  
Deputy Attorney General  
4 California Department of Justice  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 445-7376  
Facsimile: (916) 327-8643

7 Attorneys for Complainant

8  
9 **BEFORE THE**  
**BOARD OF PHARMACY**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 3072

13 **CATHLEEN E. HUTCHINSON**

**ACCUSATION**

14 8836 Fortuna Way  
Orangevale, CA 95662

15 Pharmacy Technician Registration TCH 30078

16 Respondent.

17 Complainant alleges:

18 1. Virginia Herold ("Complainant") brings this Accusation solely in her  
19 official capacity as the Executive Officer of the Board of Pharmacy ("Board"), Department of  
20 Consumer Affairs.

21 I.

22 **LICENSE HISTORY**

23 2. On July 28, 1999, the Board issued Original Pharmacy Technician  
24 Registration No. TCH 30078 to Cathleen E. Hutchinson, to act as a pharmacy technician in  
25 California. Ms. Hutchinson's pharmacy technician's registration was in full force and effect at all  
26 times relevant to the charges brought herein and will expire on March 31, 2009, unless renewed.

27 ///

28 ///



1 II.

2 STATUTORY PROVISIONS

3 3. Under Business and Professions Code ("Bus. & Prof. Code") section 4300  
4 the Board may discipline any license, for any reason provided in the Pharmacy Law, (i.e., Bus. &  
5 Prof. Code section 4000 et. seq.)

6 4. Bus. & Prof. Code section 4301 states, in pertinent part:

7 **§ 4301. Unprofessional conduct; licenses procured through**  
8 **misrepresentation, fraud, or mistake**

9 The board shall take action against any holder of a license who is guilty of  
10 unprofessional conduct or whose license has been procured by fraud or  
11 misrepresentation or issued by mistake. Unprofessional conduct shall  
include, but is not limited to, any of the following:

12 . . . .

13 (f) The commission of any act involving moral turpitude, dishonesty, fraud,  
14 deceit, or corruption, whether the act is committed in the course of relations  
as a licensee or otherwise, and whether the act is a felony or misdemeanor  
or not.

15 (g) Knowingly making or signing any certificate or other document that  
16 falsely represents the existence or nonexistence of a state of facts.

17 . . .

18 (j) The violation of any of the statutes of this state or of the United States  
19 regulating controlled substances and dangerous drugs.

20 . . . .

21 (l) The conviction of a crime substantially related to the qualifications,  
22 functions, and duties of a licensee under this chapter. The record of  
23 conviction of a violation of Chapter 13 (commencing with Section 801) of  
24 Title 21 of the United States Code regulating controlled substances or of a  
25 violation of the unprofessional conduct. In all other cases, the record of  
26 conviction shall be conclusive evidence only of the fact that the conviction  
27 occurred. The board may inquire into the circumstances surrounding the  
28 commission of the crime, in order to fix the degree of discipline or, in the  
case of a conviction not involving controlled substances or dangerous  
drugs, to determine if the conviction is of an offense substantially related to  
the qualifications, functions, and duties of a licensee under this chapter. A  
plea or verdict of guilty or a conviction following a plea of nolo contendere  
is deemed to be a conviction within the meaning of this provision. The  
board may take action when the time for appeal has elapsed, or the  
judgment of conviction has been affirmed on appeal or when an order  
granting probation is made suspending the imposition of sentence,  
irrespective of a subsequent order under Section 1203.4 of the Penal Code  
allowing the person to withdraw his or her plea of guilty and to enter a plea

of not guilty, or setting aside the verdict of guilty, or dismissing the accusation, information, or indictment.

...

(o) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of or conspiring to violate any provision or term of this chapter or of the applicable federal and state laws and regulations governing pharmacy, including regulations established by the board.

...

5. Bus. & Prof. Code section 4059 states as follows:

**§ 4059. Prescriptions; requirement; exceptions; penalties**

(a) A person may not furnish any dangerous drug, except upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7. A person may not furnish any dangerous drug device, except upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7.

6. Bus. & Prof. Code section 4060 states as follows:

**§ 4060. Controlled substances; possession**

No person shall possess any controlled substance, except that furnished to a person upon the prescription of a physician, dentist, podiatrist, optometrist, veterinarian, or naturopathic doctor pursuant to Section 3640.7, or furnished pursuant to a drug order issued by a certified nurse-midwife pursuant to Section 2746.51, a nurse practitioner pursuant to Section 2836.1, a physician assistant pursuant to Section 3502.1, a naturopathic doctor pursuant to Section 3640.5, or a pharmacist pursuant to either subparagraph (D) of paragraph (4) of, or clause (iv) of subparagraph (A) of paragraph (5) of, subdivision (a) of Section 4052. This section shall not apply to the possession of any controlled substance by a manufacturer, wholesaler, pharmacy, pharmacist, physician, podiatrist, dentist, optometrist, veterinarian, naturopathic doctor, certified nurse-midwife, nurse practitioner, or physician assistant, when in stock containers correctly labeled with the name and address of the supplier or producer.

...

7. Health and Safety Code section 11173(a), states as follows:

**§ 11158. Prescriptions for schedule II, III, IV, and V substances; practitioners authorized to administer controlled substances**

(a) Except as provided in Section 11159 or in subdivision (b) of this section, no controlled substance classified in Schedule II shall be dispensed without a prescription meeting the requirements of this chapter. Except as provided in Section 11159 or when dispensed directly to an ultimate user by a practitioner, other than a pharmacist or pharmacy, no controlled substance classified in Schedule III, IV, or V may be dispensed without a prescription

meeting the requirements of this chapter.

8. Health and Safety Code section 11350, in pertinent part, as follows:

**§ 11350. Possession of designated controlled substances; punishment and fine**

(a) Except as otherwise provided in this division, every person who possesses (1) any controlled substance specified in subdivision (b) or (c), or paragraph (1) of subdivision (f) of Section 11054, specified in paragraph (14), (15), or (20) of subdivision (d) of Section 11054, or (2) any controlled substances classified in Schedule III, IV, or V which, is a narcotic drug, unless upon the written prescription of a physician, dentist, podiatrist, or veterinarian licensed to practice in this state, shall be punished by imprisonment in the state prison.

...

9. Health and Safety Code section 11368, states as follows:

**§ 11368. Forged or altered prescriptions; punishment**

Every person who forges or alters a prescription or who issues or utters an altered prescription, or who issues or utters a prescription bearing a forged or fictitious signature for any narcotic drug, or who obtains any narcotic drug by any forged, fictitious, or altered prescription, or who has in possession any narcotic drug secured by a forged, fictitious, or altered prescription, shall be punished by imprisonment in the county jail for not less than six months nor more than one year, or in the state prison.

10. Penal Code section 487(b)(3) states, in pertinent part, as follows:

**§ 487. Grand theft defined**

Grand theft is a theft committed in any of the following cases:

...

(b) Notwithstanding subdivision (a), grand theft is committed in any of the following cases:

...

(3) Where the money, labor, or real or personal property is taken by a servant, agent, or employee from his or her principal or employer and aggregates four hundred dollars (\$400) or more in any 12 consecutive month period.

11. Bus. & Prof. Code section 118, subdivision (b), states:

The suspension, expiration, or forfeiture by operation of law of a license issued by a board in the department, or its suspension, forfeiture, or cancellation by order of the board or by order of a court of law, or its surrender without the written consent of the board, shall not, during any

period in which it may be renewed, restored, reissued, or reinstated, deprive the board of its authority to institute or continue a disciplinary proceeding against the licensee upon any ground provided by law or to enter an order suspending or revoking the license or otherwise taking disciplinary action against the licensee on any such ground.

12. Bus. & Prof. Code section 125.3 states, in pertinent part, that the Board may request the administrative law judge to direct a licensee found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

### III.

#### CONTROLLED SUBSTANCES AT ISSUE

13. "Prozac," a brand name for Fluoxetine Hydrochloride, is a dangerous drug, within the meaning of Bus. & Prof. Code 4022, that requires a prescription under federal law.

14. "Norco," a brand name for Hydrocodone, is an opiate and a Schedule III controlled substance as designated by Health & Saf. Code section 11056, subdivision (e)(4)

15. "Vicodin," a brand name for Hydrocodone, is an opiate and a Schedule III controlled substance as designated by Health & Saf. Code section 11056, subdivision (e)(4).

BRAND NAME	GENERIC NAME	DANGEROUS DRUG PER B&PC 4022	CONTROLLED SUBSTANCE PER H&S CODE	INDICATIONS FOR USE
Prozac	Fluoxetine HCl	Yes	No	Depression
Norco	Hydrocodone/ APAP 10mg/325mg	Yes	Yes-C3 HSC 11056 (e) (4)	Pain
Vicodin	Hydrocodone 5 mg with APAP	Yes	Yes-C3 HSC 11056 (e) (4)	Pain

### IV.

#### GENERAL BACKGROUND

16. From February 2000 through February 3, 2006, Respondent worked as a pharmacy technician at Longs Drug Store #93 and SavOn #7216. From January 21, 2005, through January 30, 2006, while working at Longs Drug Store #93 in Citrus Heights, California,

Respondent fraudulently filled and refilled Hydrocodone with acetaminophen prescriptions without authorization.

17. Longs Drug Store identified shortages of Hydrocodone with acetaminophen and conducted an audit and investigation. During the investigation, videotaping revealed Respondent and pharmacy technician Jennifer Sheddy conducting fraudulent activity at the pharmacy. The Sacramento County Sheriff's Department reported Respondent was responsible for 22 fraudulent changes to customer prescriptions totaling 2,940 doses of Hydrocodone and passed the medicine to a customer or removed the medication from the store herself, at a cost of \$2,176.

18. Further investigation from the Board of Pharmacy Inspector showed that from January 21, 2005, through January 30, 2006, Respondent fraudulently filled and refilled 34 HC/AP prescriptions for patients J.G. and L.O. without prescriber authorization, totaling 960 HC/AP 5/500 tablets and 3300 HC/AP 10/325 tablets. More specifically, the unauthorized prescriptions Respondent filled and refilled are as follows:

Type	Patient Name	#RXs	Drug	QTY
New	JG	9	Vicodin	540
New	JG	3	Norco	240
Refill	JG	7	Vicodin	420
Refill	JG	7	Norco	660
New	LO	4	Norco	1440
Refill	LO	4	Norco	960
<b>TOTAL</b>		34		4260

19. Investigation substantiated 34 prescriptions totaling 4,260 doses of HC/AP, including 5 prescriptions that were electronically Returned To Stock were filled or refilled without prescriber authorization.

20. Due to the theft at Longs Drugs from October 6, 2005, through January 30, 2006, a criminal complaint was filed against Respondent on July 14, 2006, in the Sacramento

1 County Superior Court, entitled, *The People of The State of California v. Cathleen E. Hutchinson*,  
2 Case No. 06F06292. On October 4, 2006, Respondent pled Nolo Contendere to a misdemeanor  
3 violation of Penal Code section 487(b)(3) for grand theft.

4 V.

5 VIOLATIONS

6 (B&P SECTION 4301(f))

7 (Obtaining controlled substance through fraud, deceit, subterfuge)

8 21. Paragraphs 16 through 20 are incorporated herein by reference.

9 Respondent is subject to disciplinary action pursuant to Bus. & Prof. Code section 4301,  
10 subdivision (f), on the grounds of unprofessional conduct, in obtaining controlled substances  
11 through fraud, deceit and subterfuge. More specifically, Respondent's acts which involve moral  
12 turpitude, dishonesty, fraud, deceit, or corruption include the following conduct:

- 13 a. Creating 34 false new and refill prescription documents for  
14 Hydrocodone with acetaminophen.  
15 b. Falsely electronically returning circa 5 prescriptions to  
16 stock, yet the prescriptions for Hydrocodone with  
17 acetaminophen 10/325 were filled and furnished from  
18 Longs.  
19 c. Stealing medication from Longs Drugs.

18 (B&P SECTION 4301(g))

19 (Forged/Altered Prescriptions)

20 22. Paragraphs 16 through 20 are incorporated herein by reference.

21 Respondent is subject to disciplinary action pursuant to Bus. & Prof. Code section 4301,  
22 subdivision (g), on the grounds of unprofessional conduct, in conjunction with Health and Safety  
23 Code section 11368. More specifically, from January 21, 2005 through January 30, 2006,  
24 Respondent forged, altered, and created 34 false new and refill prescription documents, totaling  
25 960 doses of Hydrocodone with acetaminophen 5/500 tablets and 3,300 doses of Hydrocodone  
26 with acetaminophen 10/325 tablets.

27 ///

28 ///

1 (B&P SECTION 4301(j/o))

2 (Violation of State Statutes/Laws and Regulations)

3 23. Paragraphs 16 through 20 are incorporated herein by reference.

4 Respondent is subject to disciplinary action on the grounds of unprofessional conduct, pursuant to  
5 Bus. & Prof. Code section 4301, subdivision (j), for violating the state statutes, and subdivision  
6 (o) for violating laws and regulations. More specifically, the violations are based upon the  
7 following acts:

- 8 a. Respondent violated Bus. & Prof. Code section 4060(a) and  
9 Health and Safety Code section 11350, by unlawfully  
10 possessing narcotic controlled substances. On January 6,  
11 2006, at 08:58, Respondent entered Longs Drugs on her day  
12 off, removing unauthorized prescription number 758145 for  
13 240 Hydrocodone with acetaminophen 10/325mg tablets  
14 from the will-call rack, putting the prescription bottle in a  
15 bag, placing \$10 into the register instead of cost of \$183,  
16 signing "CEH" on the signature log and leaving the  
17 pharmacy. Similarly, on January 16, 2006, at 13:09,  
18 Respondent entered unauthorized prescription number  
19 760390 for 120 Hydrocodone with acetaminophen 10/325  
mg. tablets into the register as zero cost instead of the cost of  
\$95.95, signing "CEH" on the customer signature log,  
placing the prescription bottle in a bag and leaving the  
pharmacy. Both incidents were videotaped.
- 20 b. Respondent violated Bus. & Prof. Code section 4059(a) and  
Health and Safety Code section 11158(a), in that from  
January 21, 2005, through January 30, 2006, Respondent  
furnished 960 doses of Hydrocodone with acetaminophen  
5/500 tablets and 3,300 doses of Hydrocodone with  
acetaminophen 10/325 tablets, without a prescription.

20 (B&P SECTION 4301(l))

21 (Conviction of a Crime substantially Related)

22 24. Paragraphs 16 through 20 are incorporated herein by reference.

23 Respondent is subject to disciplinary action pursuant to Bus. & Prof. Code section 4301,  
24 subdivision (l), on the grounds of unprofessional conduct, due to her misdemeanor criminal  
25 conviction under Penal Code section 487(b)(3), for grand theft of Hydrocodone with  
26 acetaminophen from her employer, Longs Drugs on October 4, 2006.

27 ///

28 ///

1 VI.

2 PRAYER

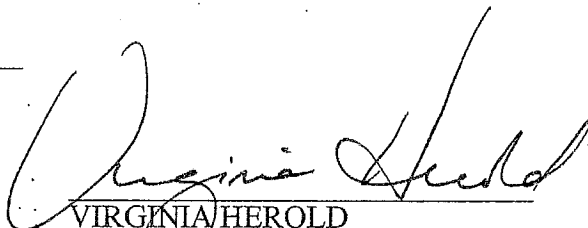
3 WHEREFORE, Complainant requests that a hearing be held on the matters herein  
4 alleged, and that following the hearing, the Board of Pharmacy issue a decision:

5 1. Revoking or suspending Pharmacy Technician Registration Number TCH  
6 430078 issued to Cathleen Hutchinson;

7 2. Ordering Respondent Cathleen Hutchinson to pay the Board of Pharmacy  
8 the reasonable costs of the investigation and enforcement of this case, pursuant to Business and  
9 Professions Code section 125.3; and

10 3. Taking such other and further action as deemed necessary and proper.

11  
12 DATED: 6/4/07

13  
14   
15 VIRGINIA HEROLD  
16 Executive Officer  
17 Board of Pharmacy  
18 Department of Consumer Affairs  
19 State of California  
20 Complainant

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